

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**SEBASTIAN NEGRON TORRES**

**DEBTOR**

**CASE NO.: 21-03391 ESL**

**CHAPTER 13**

**MOTION TO OBJECT CLAIM NUMBER 2 FILED BY DEPARTMENT OF  
TREASURY**

**TO THE HONORABLE COURT:**

**COMES NOW**, DEBTOR through the undersigned attorney and respectfully STATES, ALLEGES and PRAYS as follows:

1.- Subject claim is the claim number 2 filed on December 9, 2021, 2003 by Department of Treasury. The claim was in the amount of \$324,542.63, with a secured portion of \$279,224.77.

2.- Debtor objects to the secured portion of the claim based on the grounds that Debtor does not own any real property, creditor Treasury Department does not have a collateral to secured the debt.

**WHEREFORE**, it is respectfully requested that based on the above facts, this Honorable Court grant the objection to Claim number 2 filed by Department of Treasury, and that the secured portion of the claim be allowed as unsecured non priority amount and any other remedy it may deem appropriate.

**NOTICE**

**30 DAYS NOTICE TO ALL CREDITORS AND PARTIES IN INTEREST:**

*You are hereby notified that you have thirty (30) days from the date of this notice to file an opposition to the foregoing motion and to request a hearing. If no opposition is filed within the prescribed period of time, the Trustee's motion will be deemed unopposed and may be granted without further hearing unless (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court,*

*the interest of justice requires otherwise. If a timely opposition is filed, the court will schedule a hearing as a contested matter.*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY:** that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF Filing System which sends notification of such filing to all those who is this case have registered for receipt of notice by electronic mail. I further certify that the foregoing has been served to: Department of Treasury at PO Box 9024140, San Juan PR 00902-4140, to the Secretary of Treasury at PO Box 9024140, San Juan PR 00902-4140, to the Department of Justice, Federal Litigation Division, at PO Box 9020192 San Juan PR 00902-0192; U.S. Trustee at [ustpreion21.hrecf@usdoj.gov](mailto:ustpreion21.hrecf@usdoj.gov) and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants at the mailing address of record.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of January 2022.

**/S/Víctor C. Thomas Santiago**  
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